



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Jerome E. Fox Jr., Treasurer
Invacare Corporation Political Action Committee
AKA INVA PAC
One Invacare Way
Elyria, OH 44035

Identification Number: C00249896

AUG 3 2001

Reference: Year End Report (11/28/00-12/31/00)

Dear Mr. Fox:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the specific amount deducted per pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Alice Kang
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

| SCHEDULE A | | ITEMIZED RECEIPTS | | Use spaces available for each category of the Detailed Schedule Page | | PAGE | OF |
|--|--|-----------------------------|--|--|--|-------------------------------------|----|
| Contributions from Individuals | | | | | | FOR LINE NUMBER | |
| Any information copied from SAR Reports and Statements may not be valid or used by any person for the purpose of making contributions or for campaign purposes, other than using the name and address of any political committee to solicit contributions hereon, without the committee's consent. | | | | | | 11(a)(ii) | |
| NAME OF COMMITTEE (in full) | | | | | | | |
| National Organization PAC 000000001 | | | | | | | |
| I. Full Name, Working Address and ZIP Code | | Name of Employer | | Date (month, day, year) | | Amount of Each Receipt (in Dollars) | |
| Anne Sullivan 21 1/2 84th Street City, State ZIP | | National Organization, Inc. | | payroll deduction | | \$90.00 | |
| Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General | | Occupation | | Aggregate Total (in Dollars) | | (\$15 biweekly) | |
| <input type="checkbox"/> Other Receipt: | | Branch Manager | | \$85.00 | | | |
| II. Full Name, Working Address and ZIP Code | | Name of Employer | | Date (month, day, year) | | Amount of Each Receipt (in Dollars) | |
| Rodney Jones 881 Hainsbury Road City, State ZIP | | National Organization, Inc. | | payroll deduction | | \$120.00 | |
| Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General | | Occupation | | Aggregate Total (in Dollars) | | (\$20 biweekly) | |
| <input type="checkbox"/> Other Receipt: | | Vice President | | \$25.00 | | | |

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)

